

230770



RE: Unimatic Scan

Benjamin Alter

to:

David Rosoff, dean@framewareinc.com, mpolicastro@GHCLAW.com,
jgreli@verizon.net

07/23/2012 05:02 PM

Hide Details

From: Benjamin Alter <benjamin.alter@gza.com>

To: David Rosoff/R2/USEPA/US@EPA, "dean@framewareinc.com"
 <dean@framewareinc.com>, "mpolicastro@GHCLAW.com"
 <mpolicastro@GHCLAW.com>, "jgreli@verizon.net" <jgreli@verizon.net>

History: This message has been forwarded.

10 Attachments



image001.png Core results lab rpt.pdf Floor chip and wipe samples map.PDF PCB Air Test Results.pdf



Second Round Wipe Analytical Results.pdf Summary table 6-1-05 chip samples.pdf



Summary table 6-1-05 wipe samples.pdf Wipe Sampling 3-15-05.pdf Wipe&chips Tables.PDF



Wipes+Chips 6-01-05map.pdf

Dave:

Attached are tables and figures from the 2005 interior surface study at the former Unimatic facility. I couldn't find a table that summarized the results of the stratified core sampling, so I attached the lab report instead. The summary of the results of the stratified core sampling is shown below.

Stratified core collected at F-7 (see attached map)

Surface: 25,000 ppm

2": 12,000 ppm

4": 720 ppm

6": 5.2 ppm

Bottom: 11.0 ppm

Stratified core collected at F-11

Surface: 3,200 ppm

2": 24,000 ppm

4": 27,000 ppm

6": 36 ppm

Bottom: 60 ppm

The next email will contain the results from the 2010-2011 interior surface sampling event.

--Ben

Benjamin Alter, PG, LSRP

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Service, Solutions. Satisfaction

From: David Rosoff [<mailto:Rosoff.David@epamail.epa.gov>]

Sent: Monday, July 23, 2012 2:08 PM

To: Benjamin Alter; dean@frameworkinc.com; mpolicastro@GHCLAW.com; jgrelis@verizon.net

Subject: Fw: Unimatic Scan

Gentlemen - here is the referral letter from NJDEP. Thank you again for your time today.

Dave

761.61 (a)(4)

Self-Implementing Cleanup levels for onsite disposal:

(4) *Cleanup levels.* For purposes of cleaning, decontaminating, or removing PCB remediation waste under this section, there are four general waste categories: bulk PCB remediation waste, **non-porous surfaces, porous surfaces**, and liquids. **Cleanup levels are based on the kind of material and the potential exposure to PCBs left after cleanup is completed.**

(i) *Bulk PCB remediation waste.* Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge.

(A) *High occupancy areas.* The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤ 1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤ 10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

(B) *Low occupancy areas.* (1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤ 25 ppm unless otherwise specified in this paragraph.

(2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤ 50 ppm if the site is secured by a fence and marked with a sign including the M_L mark.

(3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤ 100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

(ii) **Non-porous surfaces.** In **high occupancy areas**, the surface PCB cleanup standard is $\leq 10 \mu\text{g}/100 \text{ cm}^2$ of surface area. In **low occupancy areas**, the surface cleanup standard is $<100 \mu\text{g}/100 \text{ cm}^2$ of surface area. Select sampling locations in accordance with subpart P of this part or a sampling plan approved under paragraph (c) of this section.

(iii) **Porous surfaces.** In both high and low occupancy areas, any person disposing of porous surfaces must do so based on the levels in paragraph (a)(4)(i) of this section. Porous surfaces may be cleaned up for use in accordance with §761.79(b)(4) or §761.30(p).

(iv) *Liquids.* In both high and low occupancy areas, cleanup levels are the concentrations specified in §761.79(b)(1) and (b)(2).

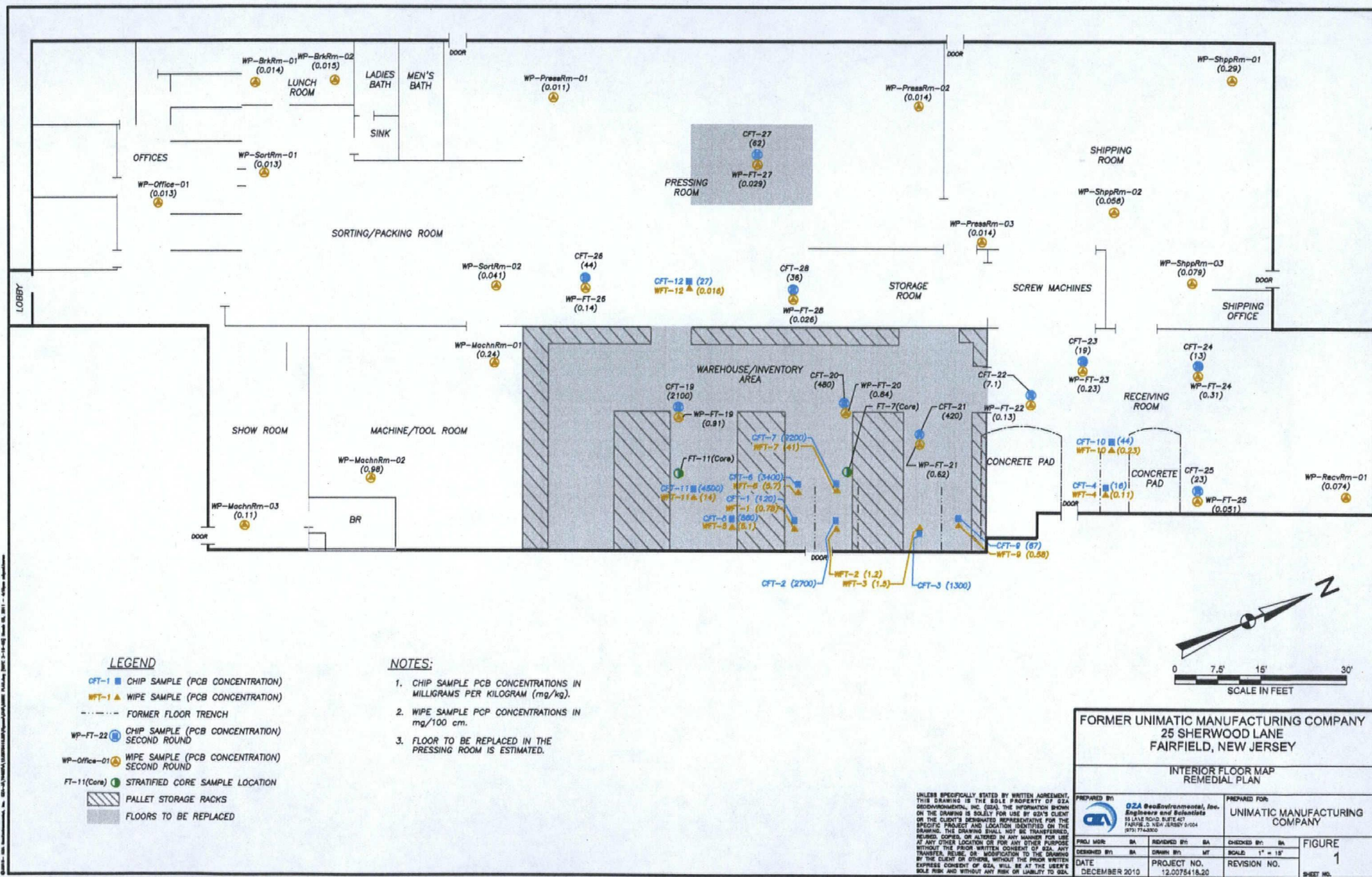
(v) *Change in the land use for a cleanup site.* Where there is an actual or proposed change in use of an area cleaned up to the levels of a low occupancy area, and the exposure of people or animal life in or at that area could reasonably be expected to increase, resulting in a change in status from a low occupancy area to a high occupancy area, the owner of the area shall clean up the area in accordance with the high occupancy area cleanup levels in paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

(vi) The EPA Regional Administrator, as part of his or her response to a notification submitted in accordance with §761.61(a)(3) of this part, may require cleanup of the site, or portions of it, to more stringent cleanup levels than are otherwise required in this section, based on the proximity to areas such as residential dwellings, hospitals, schools, nursing homes, playgrounds, parks, day care centers, endangered species habitats, estuaries, wetlands, national parks, national wildlife refuges, commercial fisheries, and sport fisheries.

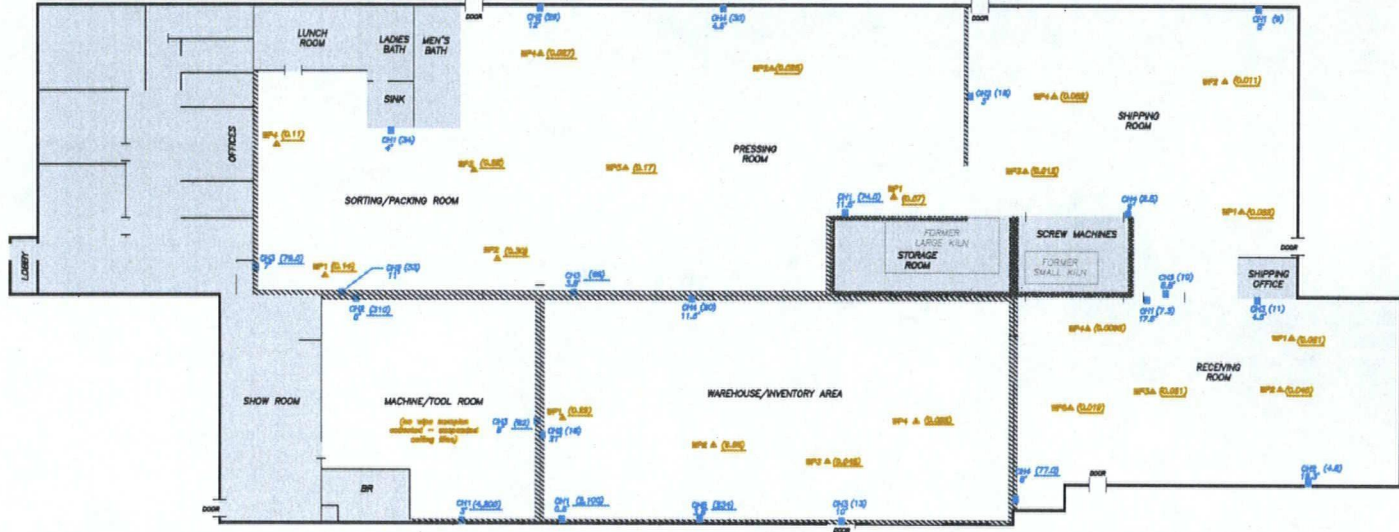
DEFINITIONS:

High occupancy area means any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: 840 hours or more (an average of 16.8 hours or more per week) for non-porous surfaces and 335 hours or more (an average of 6.7 hours or more per week) for bulk PCB remediation waste. Examples could include a residence, school, day care center, sleeping quarters, a single or multiple occupancy 40 hours per week work station, a school class room, a cafeteria in an industrial facility, a control room, and a work station at an assembly line.

Low occupancy area means any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: less than 840 hours (an average of 16.8 hours per week) for non-porous surfaces and less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste. Examples could include an electrical substation or a location in an industrial facility where a worker spends small amounts of time per week (such as an unoccupied area outside a building, an electrical equipment vault, or in the non-office space in a warehouse where occupancy is transitory).



SHERWOOD LANE

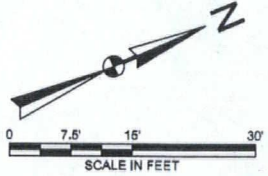


LEGEND

- CH1 (7.3)
17.5 ■ CHIP SAMPLE ID AND (LAB RESULTS) SAMPLE HEIGHT COLLECTED ON CONCRETE WALLS.
- WP4A (0.0095) ■ WIPE SAMPLE ID AND (LAB RESULTS) COLLECTED ON OVERHEAD SURFACES.
- NO SAMPLES COLLECTED IN THIS AREA. SUSPENDED CEILINGS AND/OR SHEETROCK/WALLBOARD WALLS.
- (0.07) UNDERLINE VALUE EXCEEDS THE USEPA PCB STANDARD OF 50mg/kg FOR CONCRETE CHIP SAMPLES "CH" OR THE SURFACE CLEANUP STANDARD OF 0.01 mg/100cm² FOR WIPE SAMPLES "WP".
- WALL CLEANING TO 10 FEET
- FLOOR TO ROOF WALL CLEANING

NOTES:

1. CONCRETE CHIP SAMPLES "CH" ARE IN mg/kg (Milligrams per Kilogram).
2. WIPE SAMPLES "WP" ARE IN mg/100cm² (Milligrams per 100 centimeter square).
3. ALL SAMPLES WERE COLLECTED ON JUNE 1,2,3, 2005.



FORMER UNIMATIC MANUFACTURING COMPANY 25 SHERWOOD LANE FAIRFIELD, NEW JERSEY			
WALLS AND OVERHEAD SURFACES MAP REMEDIAL PLAN			
PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists 15 LAKE ROAD, SUITE 200 FAIRFIELD, NEW JERSEY 07004 (973) 774-3300	PREPARED FOR: UNIMATIC MANUFACTURING COMPANY		
PROJ. NO.: BA DESIGNED BY: BA DATE: DECEMBER 2010	REVIEWED BY: BA DRAWN BY: MT PROJECT NO.: 12.00754-18.20	CHECKED BY: BA SCALE: 1" = 10' REVISION NO.:	FIGURE 2 SHEET NO.:

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REPRODUCED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY THEREAFTER REUSE OR ADAPTATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

**ALTERNATIVE DECONTAMINATION PLAN
FORMER UNIMATIC MFG. CO.
25 SHERWOOD LANE
FAIRFIELD, NJ**

Pursuant to its regulation of PCBs under the Toxic Substances Control Act, the United States Environmental Protection Agency (USEPA) requires remediation of PCBs on the indoor surfaces of the subject building, under regulatory standards contained in 40 CFR Part 761. Accordingly, GZA GeoEnvironmental, Inc. (GZA) hereby submits this Alternative Decontamination Plan (Plan), pursuant to 40 CFR 761.79(h), to USEPA for the building interior on behalf of our client, Unimatic Manufacturing Corporation (Unimatic).

We will proceed with the proposed actions only upon receiving approval from USEPA. Unimatic must also receive approval from its insurers to pay their negotiated shares for this work prior to implementing the Plan.

A building floor plan is attached to this Plan to assist the reader in understanding the Plan.

INTERIOR CONSTRUCTION

The building is constructed with concrete floors, cinder block interior and exterior walls, and a steel roof supported by steel trusses. The concrete floors are generally eight inches thick, with rebar. They are bare everywhere except the office area, where they are covered with carpeting inside the offices and finished wood in the common areas. The walls are generally covered with off-white paint. They are 16 to 20 feet high, except for the warehouse, where the walls rise to approximately 30 feet elevation, and the shipping room, which has a mezzanine area above it.

DECONTAMINATION STANDARDS

The following decontamination standards set by the USEPA apply to this project:

- For surface wipe samples, 0.01 milligrams of total PCBs per 100 square centimeter (mg/cm^2); and
- For bulk samples (including chip samples), 50 milligrams per kilogram (mg/kg) of total PCBs.

EXISTING CONDITIONS

In 2005, GZA collected wipe and/or chip samples of the floors, walls, and overhead surfaces inside the building. Below is a summary of the results from that sampling event.

Trusses and Other Overhead Surfaces

GZA collected 21 wipe samples from the unpainted steel trusses and other overhead surfaces in all of the rooms except where there was a suspended ceiling grid present. All but one of these wipe samples contained PCBs at concentrations exceeding 0.01 mg/cm^2 . Based on these results, GZA concludes that the surfaces of all of the trusses and other overhead surfaces are contaminated with PCBs.

Interior Floors

GZA collected 35 wipe samples and 11 chip samples on the surface of the concrete floors and the wood flooring inside the building at locations shown on the attached site plan. All of the wipe samples contained PCBs at concentrations exceeding 0.01 mg/cm^2 .

The results from the chip samples of the concrete floors varied by room. All of the chip samples collected in the warehouse contained PCBs at concentrations exceeding 50 mg/kg . One of the four chip samples collected in the pressing room contained PCBs at a concentration exceeding 50 mg/kg . None of the six chip samples collected in the receiving room contained PCBs at a concentration exceeding 50 mg/kg . No chip samples were collected in the other rooms, because their floors were not visibly black-stained.

Two stratified core samples were collected through the visibly-stained floors inside the warehouse. They indicated that the first several inches of concrete in this room are contaminated with PCBs.

We conclude that the concrete floors of the warehouse, and possibly a small portion of the pressing room of unknown areal extent, have PCB exceedances within the concrete. The concrete floors in the other rooms have surface PCB contamination, but have shown no evidence of PCB contamination below the surface. This contamination is likely cross-contamination from source areas, most likely the warehouse.

Interior Walls

All four chip samples collected from the walls of the shipping room contained PCBs at a concentration below 50 mg/kg .

In the other five major rooms inside the building, 11 chip samples were collected from the walls from 0 to 7 feet elevation. Eight of these 11 samples contained PCBs at a concentration exceeding 50 mg/kg . The two samples that met standards were collected from the west wall of the sorting room and the west wall of the receiving room. Only one of the eight chip samples collected from the walls at or above 10 feet elevation contained PCBs at a concentration exceeding 50 mg/kg (no chip samples were collected between 7 and 10 feet elevation). The one PCB exceedance from the walls above 10 feet was in a chip sample collected near the former large kiln, just outside of what is now the storage room.

In a pilot test conducted on April 1, 2011, paint was removed from portions of the eastern wall of the warehouse using the SpongeJet™ process. Wipe samples 1A and 1B were collected from the painted cinder block walls prior to removing the paint, and wipe samples 2A and 2B were collected from these same locations after removing the paint. The wipe sampling results are summarized in the table below.

Sample #	Before/After Paint Removal	PCB Conc. (µg/Wipe)
Uni-PCB-1A	Before	0.65
Uni-PCB-2A	After	2.1
Uni-PCB-1B	Before	2.5
Uni-PCB-2B	After	4.6

At sampling location A, the PCB concentration tripled with the removal of the paint. At sampling location B, the PCB concentration almost doubled. These results suggest that, rather than being a source for PCBs, the paint was being protective of PCBs, and its removal would result in increased exposure to PCBs for the building inhabitants.

On May 23, 2011, GZA collected six samples of paint from painted surfaces within the building. The attached figure shows the locations of the paint chip samples. The samples were collected from metal surfaces for ease of sampling. There was no attempt to bias the locations of these samples. The table below lists the sample results.

Sample #	Location	PCB Conc. (mg/kg)
PC-01	North wall, machine/tool room	380
PC-02	West entrance to warehouse	170
PC-03	West doorway from pressing room	39
PC-04	North wall, shipping room	48
PC-05	West doorway, receiving room	100
PC-06	East wall, sorting/packing room	110

As stated in our June 1, 2011 letter to the USEPA, these results indicate that paint on the concrete walls is not the primary source of PCBs inside the building. Instead, the paint appears to provide a sealant for PCBs entrained within the cinder block walls of the facility. We recommend avoiding disturbance of the paint on the cinder block walls inside the building.

PROPOSED SCOPE OF WORK

Once the appropriate approvals are in place, GZA proposes to remediate the interior surfaces of the building by performing the following scope of work:

- Clean the overhead horizontal surfaces, and confirm the cleaning by collecting post-remediation wipe samples and comparing the results to the USEPA Decontamination Standard;
- Clean the concrete floors except in the warehouse using the SpongeJet™ process in accordance with the standards outlined in 40 CFR 761.79.
- Clean the warehouse floors using a double wash/rinse and double paint procedure pursuant to 40 CFR 761.30(p); and
- Clean the cinder block walls using a double wash/rinse and double paint procedure pursuant to 40 CFR 761.30(p).

A detailed description of this scope of work is provided below.

Task 1: Mobilization

GZA's contractor will isolate the work areas by constructing plastic containments and decontamination stations in accordance with OSHA regulations for hazardous waste operations. Workers and visitors, including regulatory officials, will enter and exit the work area using appropriate decontamination procedures. Visitors will be required to sign a Visitor's Log prior to entering the work area.

Task 2: Surface Decontamination and Confirmation Testing

The contractor will use the SpongeJet™ process to clean the exposed, impacted overhead horizontal surfaces throughout the facility. The concrete floors will also be decontaminated using this process, excepting the warehouse. The sponges can be retrieved and reused on Site, and are discarded as PCB remediation waste at the end of the project.

After decontaminating the overhead horizontal surfaces and the above-mentioned flooring, GZA will inspect the surfaces to determine whether to proceed with post-decontamination sampling. Once determined to be visibly clean, GZA will collect one wipe sample from a random location on each steel truss, and randomly located wipe samples from the decontaminated floors at a rate of one per 1,000 square feet, with a minimum of one floor sample from each room.

If any wipe sample contains PCBs at a concentration above USEPA Decontamination Standards, the cleaning process will be repeated, and new post-decontamination samples will be collected. Once all samples are below the Decontamination Standard, the contractor will paint the decontaminated porous surfaces with two coats of PCB- and solvent-resistant paints of contrasting colors. Decontamination wastes will be sent off-site for disposal as PCB wastes.

Task 3: Double Wash/Double Paint Procedure

The contractor will use an organic solvent to clean the warehouse floor and the cinder block walls using the double wash/rinse procedure described in 40 CFR 761.372. Runoff solvent will be collected for off-site disposal. Once there are no visible traces of solvent on the surface, the surface will be rinsed with water. The solvent-laden water will be collected for off-site disposal. This process will then be repeated.

Twenty-four hours after completion of the second rinse, two layers of paint will be applied to the warehouse floor. The paint will be solvent resistant and water repellent, and each layer will have contrasting colors to allow for a visual indication of wear-through or loss of outer coating integrity. The surface will be marked with an ML Mark in a location easily visible to individuals present in the area.

Task 4: Long-Term Maintenance of Painted Surfaces

A licensed engineer will inspect the condition of the paint on the warehouse floor and the cinder block walls on a biennial basis, designed to coincide with inspections of the engineering controls to be put in place as required by the New Jersey Department of Environmental Protection (NJDEP) for the deed restriction and Classification Exception Area (CEA) to be established at the Site. Surfaces where color breakthrough is observed will be repainted with solvent resistant and water repellent paint of the appropriate color.